

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

PATRICIA DODD

Plaintiff,

v.

ROBERT GLASER, IN HIS OFFICIAL
CAPACITY; CESAR MALDONADO, IN
HIS OFFICIAL CAPACITY, AND
HOUSTON COMMUNITY COLLEGE

Defendants.

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CIVIL ACTION NO. 4:21-cv-02216

JURY DEMANDED

PLAINTIFF'S SECOND SUPPLEMENTAL RULE 26(a)(1) DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff Patricia Dodd
("Plaintiff") provide the following supplemental Rule 26 disclosures:

Respectfully submitted,

THE HALL LAW GROUP, PLLC

/s/ Benjamin L. Hall, III

Benjamin L. Hall, III

State Bar No. 08743745

Federal Bar No. 8787

bhall@bhalllawfirm.com

William L. Van Fleet II

State Bar No. 20494750

Federal Bar No. 3670

bvfleet@comcast.net

THE HALL LAW GROUP

530 Lovett Blvd.

Houston, Texas 77006

Telephone: (713) 942-9600

Facsimile: (713) 942-9566

-AND-

THE HITTNER GROUP, PLLC

George J. Hittner

State Bar No. 24038959
S.D. TX No. 431901
george.hittner@thehittnergroun.com
P.O. Box 541189
Houston, Texas 77254
Phone: (713) 505-1003

-AND-

**JIMMY ARDOIN & ASSOCIATES,
PLLC**

James Ardoin
State Bar No. 24045420
S.D. TX No. 571281
4900 Fournace Place, Suite 550
Houston, Texas 77401
Phone: (713) 574-8900
Toll Free: (888) 701-8509
Email: jimmy@jimmyardoinlaw.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record were served with Plaintiffs' Second Supplemental 26(a)(1) Disclosures on July 30, 2021.

/s/ Benjamin L. Hall, III

Benjamin L. Hall, III

PRELIMINARY STATEMENT

Plaintiffs incorporate by reference the following into all prior and subsequent disclosures, if any, they have or will provide in this action.

Plaintiffs' disclosures are made subject to and without waiving Plaintiff's right to protect any and all communications protected under the attorney-client privilege and attorney work-product doctrine.

INITIAL DISCLOSURE

- (i) The name and, if known, the address and telephone number of each individual likely to have the discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Each of the following persons is believed to have information and knowledge relevant to either the claims, defenses, and/or damages involved in this litigation:

1. Plaintiff: Patricia Dodd

Attorneys for Plaintiff:

**Benjamin L. Hall, III
William Van Fleet
THE HALL LAW FIRM
530 Lovett Blvd.
Houston, Texas 77006
(713) 942-9600**

**George Hittner
The Hittner Group, PLLC
P.O. Box 541189
Houston, Texas 77254
(713) 505-1003**

**Jimmy Ardoin
Jimmy Ardoin & Associates, PLLC
4900 Fournace Place, Suite 550
Houston, Texas 77401
(713) 574-8900**

2. Defendants:

**Robert Glaser
Houston Community College
Cesar Maldonado**

Attorneys for Defendants:

**Paul Lamp
Melissa Goins
Karczewski Bradshaw Spalding
3700 Buffalo Speedway, Suite 560
Houston, Texas 77098
713-993-7075**

**3. Janet May
Shirriaya Walker
Thomas Anderson
Rogelio Anasagasti
E. Ashley Smith
Izzy Anderson
Paul Lamp
Melissa Goins
Melissa Gonzalez
Renee Mack
David Cross
Greg Cunningham
Alan Ainsworth
Kurt Ewen
Norma Perez
Fheryl Prestage
Rodney Nathan
Charles Smith
Madeline Burillo-Hopkins
Ana Belasquez
Brandy Griffin
James Bailey
John Dziedic
John Boxie
William Carter
Donny Leveston
Aaron Henry
Fredrick Portis**

**Amy Tan
Marlene London
Melissa Miller Waters
Kristi Powers
Officers of the HCC Police Department**

HCC Employees/Attorneys/Vendor (former and present) who participated in, fostered, and/or implemented the complained of conduct alleged in this suit or are believed to have knowledge and/or information relating to same.

- 4. John P. Hansen
Adriana Tamez
Eva L. Loreda
Reagan Flowers
Monica Flores Richart
Rhonda Skillern-Jones
Cynthia Lenton-Gary
Pretta VanDible Stallworth
Carroll Robinson
Dave Wilson
Chris Oliver**

**C/O HCC
3100 Main Street
Houston TX 77002
(713) 718-2000**

These individuals are former or present members of the HCC Board of Trustees and are believed to have knowledge of the Defendants' practices and actions alleged in this case, including but not limited to their de facto ratification and approval of the conduct complained about in this case.

- 5. Wayne Dolcefino
Dolcefino Consulting
3701 Kirby Dr Ste 560
Houston, TX 77098
(713) 360-6911**

Investigative journalist who is believed to have documents relating to some of the claims asserted in this case.

- 6. Brittany Britto
Houston Chronicle
801 Texas St Ste 100
Houston, TX 77002**

(713) 220-7171

Higher Education reporter for the Houston Chronicle who is believed to possess information regarding the defendants' conduct complained about in this case.

7. **U.S. Equal Employment Opportunity Commission
Mickey Leland Building
1919 Smith St.
Houston, TX 77002
(713) 651-4900**

Governmental agency that received Plaintiff's sexual harassment, retaliation and ADA charge of discrimination, and supplement to same.

8. **Dr. Richard Chen
Baylor Scott & White Dallas Diagnostic Association Plano
4716 Alliance Blvd. Pav II
Plano, TX 75093
(469) 800-6000**

Physician familiar with Dr. Dodd's medical history and PTSD.

9. **Officers, Administrators, and Members of Harris County Sheriff's Office
1200 Baker St.
Houston, TX 77002
(713) 221-6000**

These individuals are believed to have information relating to the sexual actions of Chancellor Cesar Maldonado with a subordinate female at HCC.

10. **Kathryn Griffin Grinan
2513 N. MacGregor Way
Houston, Texas 77004
(832) 273-6273**

Ms. Griffin-Grinan is a rape victim and rape victim counselor She is consistently hired as an expert by law enforcement and governmental agencies to help recovering sexual assault survivors. She is also familiar with the status of the criminal allegations against Dr. Dodd and the rehabilitation efforts of Plaintiff relating to the trauma alleged in this case.

11. **Sheriff Ed Gonzalez
Harris County Sheriff's Office
1200 Baker St.
Houston, TX 77002
(713) 221-6000**

This individual is believed to have information relating to the relationship between Chancellor Cesar Maldonado and his female subordinate at HCC.

12. **Officers, Administrators, and Members of Houston Police Department**
61 Riesner St.
Houston, TX 77002
(713) 247-4400

These individuals are believed to have information relating to the relationship between Chancellor Cesar Maldonado and his female subordinate(s).

13. **Benjamin L. Hall, III**
State Bar No. 0874374
Federal Bar No. 8787
William Van Fleet
STATE BAR NO. 20494750
FEDERAL BAR NO. 3670
BHALL@THLF.US
BVFLEET@COMCAST.NET
THE HALL LAW FIRM
530 Lovett Blvd.
Houston, Texas 77006
(713) 942-9600

George Hittner
The Hittner Group, PLLC
State Bar No. 24038959
S.D. TX No. 431901
GEORGE.HITTNER@THEHITTNERGROUP.COM
P.O. Box 541189
Houston, Texas 77254
(713) 505-1003

Jimmy Ardoin
Jimmy Ardoin & Associates, PLLC
State Bar No. 24045420
S.D. TX No. 571281
JIMMY@JIMMYARDOINLAW.COM
4900 Fournace Place, Suite 550
Houston, Texas 77401
(713) 574-8900

The above Plaintiff's counsel are familiar with and will provide testimony regarding the necessary and associated fees and costs to prosecute this litigation.

Plaintiffs will supplement this disclosure as warranted.

- (ii) A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

See attached sworn affidavit of former HCC Police Officer, Fredrick Portis, included as Exhibit 1 to this filing.

Plaintiff cross identifies all documents listed in Defendants' Initial Disclosure and any subsequent supplemental disclosures, if any. Such cross adoption does not, however, constitute Plaintiff's consent or agreement to the admissibility or relevance of any such documents and Plaintiff expressly reserves the right to object to the use or admission of any such documents or testimony of any such witness in this case.

In addition to exhibits accompanying Plaintiff's Original Petition filed in this matter and the sworn affidavit included as Exhibit 1 to this filing, Plaintiff counsel have more responsive documents in their possession. Plaintiff's counsel is presently having those records imaged and will produce same once that imaging has been completed.

- (iii) A computation of each category of damages by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary materials, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extend of injuries suffered.

Response: The named plaintiff believes her compensatory and punitive damages, fees and costs will exceed \$10,000,000.

- (iv) For the inspection and copying as under Rule 34, any insurance agreement under which insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Response: None